

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Received & Inspected

FEB 23 2015

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2014

Date filed: 02-18-2015

Name of company covered by this certification: COMMUNICATION SPECIALIST

Form 499 Filer ID: 827614

DOCKET FILE COPY ORIGINAL

Name of signatory: CHAD CHELLSTORP

Title of signatory: MANAGER

I, CHAD CHELLSTORP, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company IS in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (SEE ATTACHED).

The company HAS NOT taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative:

The company HAS NOT received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Signed



NO. of Copies rec'd  
List ABCDE

0+1

FEB 23 2015

Communication Specialist

FCC Mail Room

64.2009 Safeguards required for use of Customer Proprietary Network Information

- (a) Communication Specialist implement's a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- (b) Communication Specialist trains their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.
- (c) Communication Specialist maintains a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Communication Specialist maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Communication Specialist shall retain the record for a minimum of one year.
- (d) Communication Specialist has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- (e) Communication Specialist has an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. Communication Specialist must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.
- (f) Communication Specialist provides written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
  - (1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
  - (2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.